

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

**BOBBY BLAND, DANIEL RAY  
CARTER, JR., DAVID W. DIXON,  
ROBERT W. MCCOY, JOHN C.  
SANDHOFFER and DEBRA H.  
WOODWARD,**

**Plaintiffs,**

**v.**

**B. J. ROBERTS, individually and  
in his official capacity as Sheriff  
of the City of Hampton, Virginia,**

**Defendant.**

**CASE NO: 4:11cv45**

**AFFIDAVIT OF MAJOR KENNETH RICHARDSON**

**COMMONWEALTH OF VIRGINIA  
CITY OF HAMPTON, to-wit:**

1. At all times relevant to plaintiffs' Complaint, I have worked for Sheriff Roberts in the Hampton Sheriff's Office, in the position of Major.
2. I base this Affidavit on personal knowledge and on records maintained in the ordinary and regular course of business.
3. In 2009, many employees in the Sheriff's Office did not buy or sell tickets to the Sheriff's golf tournament. I did not share that information with Sheriff Roberts or anyone else.
4. Buying or selling golf tournament tickets was not a condition of reappointment by Sheriff Roberts and I did not indicate that to any employee with whom I spoke.

5. Sheriff Roberts reappointed many employees who did not participate in the sale of golf tournament tickets.

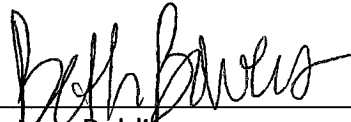
6. At no time did I discuss with Sheriff Roberts which candidate plaintiffs or any other appointee supported.



MAJOR KENNETH RICHARDSON

This day personally appeared before me, the undersigned Notary Public in and for the county/city and state aforesaid, Major Kenneth Richardson, who after first being duly sworn, deposed and said that the facts contained in the foregoing instrument are true and correct.

Sworn and subscribed to before me this 8 day of December, 2011.



Notary Public

My Commission Expires: 1/31/14  
Registration No.: 7271879